

DPS:nnb

United States District Court  
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

Criminal No.:

11-mj-548-JSM

JAMEE LEAH SPILLMAN,

a/k/a/ Tracy Fuller, Barbara Glass, Rochelle Jackson, Jasmine  
Johnson, Renae Johnson, Rence Johnson, Rence Johnson, Jamee  
Leah Jones, Diane Moore, Emma Lou Smillman, Angie  
Spillman, Emma Spillman, Emma Lou Spillman, Jamee  
Spillman, Leah Jamee Spillman, Jamee Leah Spillman-Jones,  
Jazz Mine Stewart, Jazz-Mine Stewart, Jazzmine Stewart,  
Emma Wagner, James Stephen Wagner, James Stephen  
Wagner, Jamie Wagner, Patricia William, Jayme Williams,  
Patricia Williams, Patricia Ann Williams, Patsy Williams

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my  
knowledge and belief.

Count 1 On or about August 24, 2011, in the State and District of Minnesota, County of Hennepin, City of Minnetonka,  
defendant did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal  
Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit  
Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and  
credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as  
set forth in the attached affidavit, continued on the attached sheet and made a part hereto in violation of Title 18 United States  
Code, Section 1344.

Counts 2-~~7~~ See attached sheet.

I further state that I am a(n) Special Agent and that this complaint is based on the following

facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

*Francis P. McQuillan Jr.*  
Signature of Complainant

Francis P. McQuillan  
Secret Service

Sworn to before me, and subscribed in my presence,

12/19/11  
Date

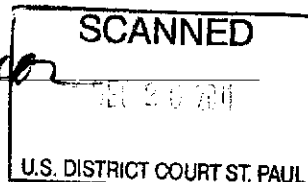
The Honorable Janie S. Mayeron  
UNITED STATES MAGISTRATE JUDGE

Name &amp; Title of Judicial Officer

at

St. Paul, MN  
City and State

*Janie S. Mayeron*  
Signature of Judicial Officer



Attachment to Complaint  
United States v. Jamee Leah Spillman

Count 2

on or about August 24, 2011, in the State and District of Minnesota, in the County of Hennepin, city of Minnetonka, the defendant, Jamee Leah Spillman, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section 1344.

Count 3

on or about August 24, 2011, in the State and District of Minnesota, in the County of Hennepin, city of Champlin, the defendant, Jamee Leah Spillman, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section 1344.

Count 4

on or about September 2, 2011, in the State and District of Minnesota, in the County of Stearns, city of St. Cloud, the defendant, Jamee Leah Spillman, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section 1344.

Count 5

on or about September 2, 2011, in the State and District of Minnesota, in the County of Stearns, city of St. Cloud, the defendant, Jamee Leah Spillman, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section 1344.

Count 6

on or about September 2, 2011, in the State and District of Minnesota, in the County of Hennepin, City of St. Louis Park, the Jamee Leah Spillman, did knowingly and intentionally execute, and

Attachment to Complaint  
United States v. Jamee Leah Spillman

attempt to execute, a scheme and artifice to defraud , U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section 1344.

Count 7

on or about October 4, 2011, in the State and District of Minnesota, in the County of Hennepin, City of Minneapolis, Jamee Leah Spillman, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud , U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section 1344.

STATE OF MINNESOTA                    )  
  ) SS. FRANCIS MCQUILLAN  
COUNTY OF RAMSEY                    )

1. Your affiant, Francis McQuillan, being first duly sworn, states that the following is true and correct to the best of his knowledge and belief:

2. I am a Special Agent of the U.S. Secret Service, United States Secret Service, and have been so employed since June 2010. My duties and responsibilities include conducting criminal investigations of individuals and entities for possible violations of Federal laws, particularly those laws found in Title 18 of the United States Code.

3. I am a graduate of the Criminal Investigator Training Program of the Federal Law Enforcement Training Center (FLETC) in Brunswick, Georgia and the Special Agent Training Course at the U.S. Secret Service Training Center in Laurel, Maryland. I am currently assigned as a Special Agent with the Minneapolis Field Office, and am authorized to investigate certain criminal violations of federal law.

4. The facts in this affidavit come from my personal observations and information obtained from other law enforcement officers, investigators and witnesses. The information in this affidavit is provided for the limited purpose of establishing probable cause and does not set forth all of my knowledge about this matter. This is not a complete statement of all the facts related to this investigation.

5. In the fall of 2011, your affiant learned from investigators of the Target Corporation (hereafter "Target") that during the summer of 2011 many Target retail stores in Minnesota were reporting that a group of subjects were passing personal checks as traveler's checks. This scheme was conducted

by individuals who made purchases of merchandise and gift cards at Target retail stores using personal checks drawn from accounts that were either closed or accounts that had insufficient funds. As part of the scheme to defraud, these individuals would advise the Target cashier handling the transaction that the personal check was a "traveler's check" and would tell the Target cashier to enter the check into the register as a traveler's check. The Target cashiers complied with the requests on many occasions.

6. Your affiant has learned from Target investigators that when a check is submitted at a Target retail checkout register as a "traveler's check" it receives a special routing which bypasses the check authorization process that occurs when a personal check is passed at Target. It often takes several days for these personal checks that are passed as traveler's checks to reach the financial institution that holds the account from which these checks are drawn. Therefore, due to the delay in authorization, a person who passes a personal check designated as a "traveler's check" has time to leave the store and avoid immediate detection.

7. Using Target store surveillance recordings and comparing them to driver's license photographs, Target investigators were able to identify Jamee Leah SPILLMAN, who has used multiple alias names, as an individual who has engaged in the scheme to defraud described above.

8. In December 2011, your affiant contacted a USAA Federal Savings Bank investigator and learned that William Spilman opened an USAA Federal Savings Bank account with a routing number of 314074269 and an account number of 123664845. No other account holders were listed. The account was opened on April 18, 2011 and closed on August 9, 2011. USAA Federal

Savings Bank is insured by the Federal Deposit Insurance Corporation.

9. On August 24, 2011, Target video surveillance shows Jamee SPILLMAN at the Target store located in Minnetonka, Minnesota. SPILLMAN can be seen making a purchase at approximately 7:37 p.m. for three \$100.00 gift cards, and one \$50.00 gift card for a total cost of \$373.00.

10. The Target receipt from that transaction shows that the purchase was made with a personal check, designated as a "traveler's check," bearing routing number 314074269, account number 123664845, and check number 8776. As set forth above, this account was opened solely by William Spilman and closed on August 9, 2011.

11. Your affiant has had an opportunity to view a copy of the check which was presented and signed by SPILLMAN during this transaction. The check lists the account holders as "William Spilman and Jamee Spillman," and lists the address of the account holders as on Hennepin Avenue in Minneapolis, Minnesota. The address is not the address used to open the account, but instead is that of a United Parcel Service retail store.

12. At approximately 7:39 p.m., video surveillance shows Jamee SPILLMAN making a second purchase at the same Target store for an amount of \$267.00 for two \$100.00 gift cards and one \$50.00 gift card. The receipt from that transaction shows that the purchase was again made with a personal check designated as a "traveler's check," drawn on USAA Federal Savings Bank, bearing the routing number 314074269, account number of 123664845, check number 8777, and listing account holders

"William Spilman and Jamee Spillman." The check was presented and signed by Jamee SPILLMAN.

13. Later on August 24, 2011, Target video surveillance shows SPILLMAN at a different Target store located in Champlin, Minnesota, making a purchase at approximately 9:31 p.m. for in the amount of \$110.11. The Target receipt from that transaction shows that a check payment of \$100.00 was initially declined. Almost immediately thereafter, a personal check designated as a "traveler's check," for \$100.00 bearing the routing number 314074269, an account number of 123664845, and check number 8778, listing account holders William Spilman and Jamee Spillman was presented and signed by Jamee SPILLMAN. A gift card was then used to pay for the remaining balance of \$10.11. The purchase was for food and other miscellaneous cleaning items.

14. At approximately 9:36 p.m., Target video surveillance shows the SPILLMAN making a second purchase for an amount of \$375.82. The evidence from that transaction shows that the purchase was made with a personal check designated as a "traveler's check," bearing the routing number 314074269, an account number of 123664845, and check number 8779, listing account holders William Spilman and Jamee Spillman. The check was presented and signed by Jamee SPILLMAN.

15. On September 2, 2011, Target video surveillance shows SPILLMAN at a Target store in Saint Cloud, Minnesota, at approximately 6:16 p.m., making a purchase of two quilts and a coverlet for an amount of \$325.66. Evidence reviewed from that transaction shows SPILLMAN made the purchase by presenting and signing a personal check designated as a "traveler's check," bearing routing number 314074269, account number of 123664845,

check number 8516, listing account holders William Spilman and Jamee Spillman.

16. At approximately 6:18 p.m., Target video surveillance shows SPILLMAN making a second purchase of several infant swaddles and baby monitors for an amount of \$368.24. The evidence from that transaction shows that the purchase was made with a personal check designated as a "traveler's check," bearing the routing number 314074269, an account number of 123664845, and check number 8517, listing account holders William Spilman and Jamee Spillman. The check was presented and signed by Jamee SPILLMAN.

17. At approximately 6:19 p.m., Target video surveillance SPILLMAN making a third purchase of three \$100.00 gift cards, one \$50.00 gift card, and other merchandise for an amount of \$374.60. The evidence from that transaction shows that the purchase was made with a personal check designated as a "traveler's check," bearing the routing number 314074269, an account number of 123664845, and check number 8518, listing account holders William Spilman and Jamee Spillman. The check was presented and signed by Jamee SPILLMAN.

18. Later on September 2, 2011, Target video surveillance shows SPILLMAN at a different Target retail store in Saint Cloud, Minnesota, making a purchase at approximately 7:13 p.m. of miscellaneous cosmetic products for an amount of \$385.99. The evidence from that transaction shows that the purchase was made with a personal check designated as a "traveler's check," bearing the routing number 314074269, an account number of 123664845, and check number 8519, listing account holders William Spilman and Jamee Spillman. The check was presented and



signed by Jamee SPILLMAN.

19. At approximately 7:16 p.m., video surveillance shows SPILLMAN making a second purchase of three \$100.00 gift cards and one \$50.00 gift card for an amount of \$373.00. The evidence from that transaction shows that the purchase was made with a personal check designated as a "traveler's check," bearing the routing number 314074269, an account number of 123664845, and check number 8795, listing account holders William Spilman and Jamee Spillman. The check was presented and signed by Jamee SPILLMAN.

20. Later on September 2, 2011, at approximately 8:57 p.m., Target video surveillance shows SPILLMAN in the Starbucks store located within a Target store in St. Louis Park, Minnesota, making a purchase of three \$100.00 gift cards, one \$50.00 gift card and two food items for \$377.83. The evidence from that transaction shows that the purchase was made with a personal check designated as a "traveler's check," bearing the routing number 314074269, an account number of 123664845, and check number 8796, listing account holders William Spilman and Jamee Spillman. The check was presented and signed by Jamee SPILLMAN.

21. On October 4, 2011, at approximately 7:54 p.m., Target video surveillance shows SPILLMAN at a Target in Minneapolis, Minnesota, making a purchase of bedding, three hampers, a light bulb and two cleaning products for \$377.45. The evidence from that transaction shows that the purchase was made with a personal check designated as a "traveler's check," bearing the routing number 314074269, an account number of 123664845, and check number 8543, listing account holders William Spilman and

Jamee Spillman. The check was presented and signed by Jamee SPILLMAN.

22. At approximately 7:57 p.m., Target video surveillance shows SPILLMAN making a second purchase of merchandise for \$419.69. The evidence from that transaction shows that the purchase was made with a personal check designated as a "traveler's check," in the amount of \$400.00, bearing the routing number 314074269, an account number of 123664845, and check number 8833, listing account holders William Spilman and Jamee Spillman. The check was presented and signed by Jamee SPILLMAN. A gift card was then used to pay for the remaining balance of \$19.69.

23. At approximately 7:59 p.m., Target video surveillance shows SPILLMAN making a third purchase of food items for \$12.39. The receipt from that transaction shows that the purchase was made with a gift card.

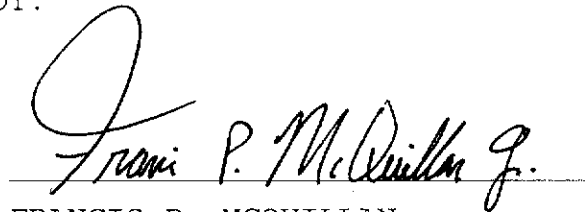
24. At approximately 8:03 p.m., Target video surveillance shows SPILLMAN making a fourth purchase of three \$100 gift cards and one \$50.00 gift card for \$373.00. The evidence from that transaction shows that the purchase was made with a personal check designated as a "traveler's check," bearing the routing number 314074269, an account number of 123664845, and check number 8835, listing account holders William Spilman and Jamee Spillman. The check was presented and signed by Jamee SPILLMAN.

25. At approximately 8:04 p.m., Target video surveillance shows SPILLMAN making a fifth purchase of four \$100 gift cards for \$424.00. The evidence from that transaction shows that the purchase was made with a personal check designated as a "traveler's check," in the amount of \$400.00, bearing the

routing number 314074269, an account number of 123664845, and check number 8836, listing account holders William Spilman and Jamee Spillman. The check was presented and signed by Jamee SPILLMAN. The remaining balance of the purchase was paid for with a cash payment of \$24.00.

26. Based on the foregoing facts, I respectfully request that an arrest warrant be issued for Jamee Leah SPILLMAN for violations of Title 18, United States Code, Section 1344, for Bank Fraud.

FURTHER YOUR AFFIANT SAYETH NOT.

A handwritten signature in cursive script, reading "Francis P. McQuillan Jr.", written over a horizontal line.

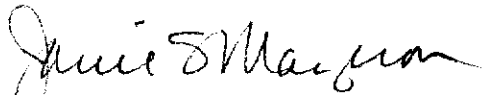
FRANCIS P. MCQUILLAN

Special Agent

U.S. Secret Service

SUBSCRIBED AND SWORN to before me this

19th day of December, 2011

A handwritten signature in cursive script, reading "Jamie S. Mayeron", written over a horizontal line.

Jamie S. Mayeron

U.S. Magistrate Judge